

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

BRADLEY ERHART,  
  
Plaintiff,

v.

CAUSE NO. 1:21-cv-01829-TAB-TWP

NANCY ERHART,  
  
Defendant.

**PLAINTIFF'S PRELIMINARY WITNESS AND EXHIBIT LIST**

Plaintiff Bradley Erhart states the following witnesses and exhibits may be called or introduced at trial:

**Preliminary Witness List**

1. Bradley Erhart
2. Nancy Elizabeth Erhart
3. Robert Williams
4. Sarah Erhart
5. John M. Joyce
6. L. Kay Larsen
7. Carol Souder
8. Gary Souder
9. Larry Souder
10. Representative from Star Financial Bank
11. Randal Shelle
12. Randal Shelle's son

13. Any witnesses necessary to evaluate the actions taken by Nancy Erhart in the administration of the Trust.
14. Any witnesses necessary to testify regarding the location or quantity of assets of the Trust.
15. Any witnesses necessary to authenticate documents.
16. Any witnesses necessary for purposes of rebuttal or impeachment.
17. Any disclosed expert witnesses.
18. Any witnesses identified by other parties in this action.

Bradley Erhart reserves the right to amend this Preliminary Witness List as discovery and investigation continues or as additional information becomes available.

**Preliminary Exhibit List**

1. The Estate Planning Documents of Mary E. Catron, including the Mary E. Catron Living Trust, dated February 2001, and any notes and/or correspondence pertaining to such Estate Planning Documents.
2. All financial records in the possession of Star Financial Bank regarding the assets of the Trust.
3. All other documents and communications regarding or evidencing the assets of the Trust.
4. All documents and communications regarding the administration of the Trust, including the disbursement of assets.
5. All documents evidencing the value of Trust Assets, including the value of the farm land.
6. All communications between Nancy Erhart and others regarding the Trust, or the administration of the Trust.
7. All items identified in any depositions taken or to be taken in this action.
8. Any report prepared by an expert witness.
9. Demonstrative exhibits and summaries.
10. Rebuttal or impeachment exhibits.
11. All or certain discovery produced by any party to this action.
12. All documents identified by Nancy Erhart.

Bradley Erhart reserves the right to amend this Preliminary Exhibit List as discovery and investigation continues or as additional information becomes available.

Dated: December 30, 2021 Respectfully submitted,

/s/ Kimberly S. DalSanto

Kimberly S. DalSanto, Atty. No. 32666-03

Sarah C. Jenkins, Atty. No. 26421-53

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*Attorneys for Bradley Erhart*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on December 30, 2021, the foregoing was filed electronically with the Court's ECF system and served upon all parties of record.

/s/ Kimberly S. DalSanto

Kimberly S. DalSanto